

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

**IN RE PORK ANTITRUST  
LITIGATION**

**Case No. 18-cv-1776 (JRT/HB)**

**This Document Relates to Commercial  
and Institutional Indirect Purchaser  
Plaintiffs' Action**

**DECLARATION OF IAN F. MCFARLAND IN SUPPORT OF COMMERCIAL  
AND INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION TO  
COMPEL COMPLIANCE WITH SUBPOENA DIRECTED TO PACIFIC AGRI-  
PRODUCTS, INC.**

I, Ian F. McFarland, declare as follows:

1. I am an attorney on the Steering Committee for Commercial and Institutional Indirect Purchaser Plaintiffs ("CIIPPs") in the above captioned litigation. I submit this declaration in support of CIIPPs' Motion to Compel Compliance with Subpoena Directed to Pacific Agri-Products, Inc. ("Pacific"). I am familiar with the facts set forth herein, based on my personal knowledge, involvement in the proceedings, and review of the materials referenced herein.

2. Attached as Exhibit A is a true and correct copy of the CIIPPs' Fourth Amended Complaint filed in In Re Pork Antitrust Litigation, No. 18-cv-1776 (D. Minn.) on June 15, 2021.

3. Attached as Exhibit B is a true and correct copy of the subpoena duces tecum, served on Pacific on May 10, 2021.

4. Attached as Exhibit C is a true and correct copy of Pacific's objections to CIIPPs' subpoena, served on CIIPPs May 21, 2021.

5. Attached as Exhibit D is an email chain between Ian McFarland and Adrian Sawyer (and others), dated June 25-26, 2021.

6. Attached as Exhibit E is an email chain between Ian McFarland and Adrian Sawyer (and others), dated May 28, 2021 to June 17, 2021.

I affirm under penalty of perjury this 3rd day of December, 2021, that the foregoing is true to the best of my knowledge.

/s/ Ian F. McFarland

Ian F. McFarland